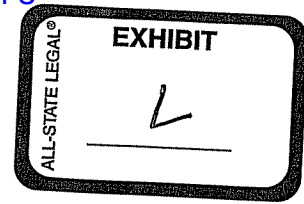


EXHIBIT L

AFFIDAVIT OF WARDEN VINCENT GUARINI



**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

RICHARD C. SMITH,
Plaintiff

No.1:08-cv-1397
Civil Action - Law

PRIMECARE MEDICAL, INC.,
CARL A HOFFMAN., JR., DO
THERESA M HOFFMAN,
JOSHUA D. LOCK,
MARCY HOFFMAN-SCHLEGEL,
FRANK KOMYKOSKI, and
KNIGHTS OF VON DUKE, LTD.,
Defendants

Chief Judge Kane

Jury Trial Demanded

AFFIDAVIT OF WARDEN VINCENT A. GUARINI

I, Vincent A. Guarini, do hereby swear that the following is true and correct to the best of my knowledge, information and belief:

1. I have been the warden at Lancaster County Prison since April 1981.
2. In 2007, Lancaster County sent out requests for proposals for contracting the medical services for the Lancaster County Prison.
3. Prime Care Medical submitted a proposal in the response to the RFP.
4. To the best of my belief, Richard Smith was an official of Prime Care Medical. During discussions about Prime Care Medical's proposal my recollection is that his contribution was minimal.
5. Lancaster County awarded the contract to Prime Care Medical in November 2007.

6. My staff and I receive quarterly reports from Prime Care Medical which details any staffing vacancies as well as the number of hours Prime Care Medical's staff and their credentialed abilities in providing services to Lancaster County pursuant to its contract.

7. This information is part of our contract requirement since it would allow a financial penalty to Prime Care Medical if the prison coverage and work output were not met.

8. I have not invoked the staffing penalty clause.

9. Prime Care Medical representative and I have discussed staffing issues and changes since Prime Care Medical started providing services in November 2007. We have been able to amicably work out staffing issues to my satisfaction.



Vincent A. Guarini

Sworn to and subscribed
Before me this 27 day
of August, 2009.

Notary Public
My Commission Expires:

